

Response to comments of Mr. Aaron Read.

Mr. Aaron Read has commented on the NPRM by saying that he opposes the use of FM translators by AM stations. Mr. Read claims that allowing the use of translators by AM stations will cause interference in the FM band. Mr. Read fails to realize that nothing, absolutely nothing in the NPRM would cause more interference on the FM band. Mr. Read joins others who have not really looked at the NPRM closely but rather have gone off “half cocked “on the issue of interference. The NPRM does not even address any expansion of the translator service or any special windows or openings for use by AM stations. Nor does it speak of any relaxation of overlap and separation requirements. There will be no increase in interference if the Commissions allows AM stations on translators. Simply stated, all the NPRM will do at this writing is *allow* existing or applied for translators to be fed by AM stations. That is all, nothing more. How can allowing a wider variety of stations to FEED existing or new translators cause more interference? Under the NPRM the only thing we will see is flexibility. If a translator cannot fit in any given area now, it still will not fit if AM stations are allowed to be the modulation source. Translators that do or will exist will still be based on current regulations but will simply have the flexibility of being fed by AM or FM stations. Commenters should have a clear understanding of this point. As to his suggestion for putting AM stations on HD carriers of high powered FM stations, the idea has good intentions but is technically absurd. The FCC will never be able to force any station to carry programming on its facilities of another licensee. To do so is restraint of trade and clearly illegal. You cannot require one broadcaster to sacrifice a potential income producing “channel” in order that an AM station be allowed to operate on it. If a station desires to have one of its HD carriers used by an AM station that could be done under existing rules at the *option* for the FM station. Any commercial FM station could at this writing put the programming of an AM station on its HD

carriers as desired TODAY. But to require or force any FM station to do this is a violation of several regulations. Even if such an action were legal it would not be practical. AM stations need relief now, not in years to come when HD radios “catch on” to the point where they are even half as common as analog radios. Mr Read also misses another very important point. He suggests that after five years the AM station that gets on an FM station HD carrier has its AM license deleted after five years. This is most absurd. It took FM two decades to have any real impact. Mr. Read expects HD to become popular enough in five years to warrant shut down of analog AM.? I think not. Further, if the AM license is cancelled the station is no longer a licensee and the FM station would no longer be required to carry them. You could not legally “license” the HD carrier to the AM station. Further, if the FM station were to go off air or out of business, the former AM station would also leave the air with no recourse. This is relief?

The NPRM as written causes NO increase in interference. I challenge anyone to show me where it increases interference in any way.

The NPRM does not decrease separation requirements or allow a gross increase in allowed power. Most urban areas are already flooded with translators and this NPRM would not allow any changes that would grant more translators to such areas where they will not now fit. In most cases you will simply see translators that are now broadcasting programs from remote stations, sold or leased to local AM stations who will then supply their own programming. How does this cause interference? If an AM stations applies for a NEW translator it would be under the same interference standards now existing for translators being fed by FM stations.

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